

08/28/2007 08:41 FAX 804 5272369

HRH-MID-MARKETING

005

The State of Tennessee, Madison County  
Circuit Court

Laslie Ragan  
\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_

SUMMONS IN A CIVIL ACTION

No. C-07-274

vs.

Plaintiff

COPY

Lansing Building Products, Inc.  
\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_

Lansing Building Products, Inc.  
Highest Ranking Official  
169 Commerce Center Circle  
Jackson, TN 38301  
\_\_\_\_\_  
\_\_\_\_\_

Defendant(s)

Address

To the above named defendant (s): Lansing Building Products, Inc.  
You are hereby summoned and required to answer, in writing, the complaint which is herewith served

upon you, and to serve a copy of same upon Gilbert & Russell PLC  
\_\_\_\_\_, who is plaintiff's Attorney, whose address is 2021 Graystone Park Jackson  
TN 38301, within thirty (30) days after service of this summons upon you, exclusive of the date of  
service. If you fail to do so, a judgment by default will be taken against you for the relief demanded in the  
complaint.

Issued this 22 day of August, 2007



By: D. Doherty  
Deputy Clerk

## RETURN ON SERVICE OF SUMMONS

I hereby certify and return, that on the 23 day of August, 2007, I served this  
summons together with a copy of the complaint herein as follows:

Kim O. Loyd - Reg Mgr  
\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_

Sheriff

D. Doherty  
Deputy Sheriff

Tallas

#745

EXHIBIT A

08/28/2007 08:41 FAX 804 5272369

HRH-MID-MARKETING

006

FILED

IN THE CIRCUIT COURT FOR MADISON COUNTY TENNESSEE

JUDY BARNETT, CIRCUIT COURT CLERK

AUG 22 2007

DY

DEPUTY CLERK

11:40

A.M.

P.M.

LESLIE RAGAN

Plaintiff,

COPY

v.

NO C-07-274

LANSING BUILDING PRODUCTS, INC.

Defendant

JURY DEMANDED

DIV I - Morgan

---

COMPLAINT

---

COMES THE PLAINTIFF, LESLIE RAGAN, filing this Complaint against the Defendant, LANSING BUILDING PRODUCTS, INC. She shows:

PARTIES, JURISDICTION, AND VENUE

1. Leslie Ragan is a resident of Jackson, Tennessee.
2. The Defendant, Lansing Building Products, Inc., is a corporation which operates in Jackson, Tennessee and employed Plaintiff in Jackson, Tennessee.
3. Venue is proper in this Circuit Court as the Defendant operates in Madison County, employed Plaintiff in Madison County, and the operative facts occurred in Madison County.
4. This court has jurisdiction under the Tennessee Human Rights Act (THRA), Tenn. Code Ann. 4-21-101 et. seq.

08/28/2007 08:41 FAX 804 5272369

HRH-MID-MARKETING

007

**FACTUAL BASES FOR SUIT**

5. Defendant, through its regional manager, Ken Logue, harbored an animus against hiring a female such as Plaintiff where at least one female employee already exists in the same workplace
6. Defendant's attitude, through Logue, is that such women will wear their emotions on their sleeves, that hiring such women is a dangerous practice, that women can and will twist anything into sexual harassment, and that, unless the woman is "butch and stocky," it is best not to hire a woman where it is possible to obtain a man.
7. Defendant's sales manager, Zack Farris, crossed Logue's discriminatory judgments and hired Plaintiff, a female, for the position of inside sales anyway.
8. Defendant, through Logue, said Plaintiff would wear her emotions on her sleeve, that she would twist things as women are prone to do, and that having two women in the same store was an unwise managerial decision.
9. Defendant, through Logue, said "one woman is enough" and that he would overrule Farris's decision to hire Plaintiff.
10. Defendant then "made a file" against Plaintiff to justify terminating her employment not long after her hire and acknowledged that Logue did not like Plaintiff's hire as a female and that Logue did not want any more women.
11. As a result of Defendant's decision, Plaintiff has lost wages, benefits and has suffered humiliation and embarrassment accompanying such a discriminatory discharge.

08/28/2007 08:42 FAX 804 5272360

HRH-MID-MARKETING

008

CAUSES OF ACTION

12. The foregoing facts are incorporated. Plaintiff brings the following causes of action:

A. Sex/Gender Discrimination Under Tennessee Human Rights Act:

13. Plaintiff seeks her lost wages (front and back pay), lost benefits, compensatory damages, attorneys fees, and costs along with injunctive relief to estop Defendant from making employment decisions based upon sex/gender.

14. Plaintiff demands a jury.

Respectfully submitted,



Justin S. Gilbert

TN Bar No. 017079

Michael L. Russell

TN Bar No. 20268

Gilbert & Russell, PLC

2021 Greystone Dr.

P. O. Box 11357

Jackson, TN 38308

Telephone: 731-664-1340

Facsimile: 731-664-1540

ATTORNEYS FOR PLAINTIFF